

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re:	§	
	§	
WBH Energy, LP,	§	Case No. 15-10003
WBH Energy Partners LLC	§	
WBH Energy GP, LLC	§	Chapter 11
	§	
Debtors.	§	Jointly Administered

**CL III FUNDING HOLDING COMPANY, LLC’S MOTION FOR ENTRY OF
STIPULATION AND AGREED ORDER MODIFYING SCHEDULING ORDER FOR
THE FOLLOWING CONTESTED MATTERS: (1) MOTION FOR RELIEF FROM
AUTOMATIC STAY TO FORECLOSE ON COLLATERAL OWNED BY WBH
ENERGY LP; (2) MOTION FOR RELIEF FROM AUTOMATIC STAY TO
FORECLOSE ON COLLATERAL OWNED BY WBH ENERGY PARTNERS LLC; (3)
MOTION TO CONVERT BANKRUPTCY CASE OF WBH ENERGY LP TO CHAPTER
7; AND (4) MOTION TO CONVERT BANKRUPTCY CASE OF WBH ENERGY
PARTNERS, LLC TO CHAPTER 7
FILED BY CL III FUNDING HOLDING COMPANY LLC
[Relates to Docket No. 157]**

CL III Funding Holding Company, LLC (“Castlelake” or “CL III”) files this Motion for for Entry of Stipulation and Agreed Order Modifying Scheduling Order for the Following Contested Matters: (1) Motion For Relief from Automatic Stay to Foreclose on Collateral Owned by WBH Energy LP; (2) Motion for Relief from Automatic Stay to Foreclose on Collateral Owned by WBH Energy Partners LLC; (3) Motion to Convert Bankruptcy Case of WBH Energy LP to Chapter 7; and (4) Motion to Convert Bankruptcy Case of WBH Energy Partners, LLC to Chapter 7 Filed by CL III Funding Holding Company LLC (“Motion”) and respectfully requests that the Court grant the Motion and enter the Stipulation and Agreed Order Modifying the Scheduling Order attached as Exhibit A.

Respectfully submitted,

SNOW SPENCE GREEN LLP

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**ATTORNEYS FOR SECURED
CREDITOR CL III FUNDING
HOLDING COMPANY, LLC**

CERTIFICATE OF SERVICE

The undersigned certifies that on March 20, 2015, a true and correct copy of this document was served by electronic means via the Court's ECF noticing system.

/s/ Kenneth Green
Kenneth Green